

EXHIBIT 3

From: [David Grassi](#)
To: ["Daniel Zemel"](#)
Cc: [Chad Diamond](#); [Nicholas Linker](#); [Chad Echols](#); [Salley Odom](#)
Subject: RE: Hallager v ARS Discovery Responses
Date: Wednesday, August 11, 2021 5:34:00 PM
Attachments: [image001.png](#)

Daniel,

Are you also withdrawing the non-privilege objections as outlined in my letter?

Regarding depositions, I have requested my client's availability and will let you know when I have a response. I anticipate that my client will want me to depose your client. Please provide some available dates and we will re-notice his deposition. As before, it will be an in person deposition.

Finally, I believe we are required to mediate by September 17. Before we reach out to the mediator regarding her availability, do you want to engage in some settlement discussions? My recollection is that we still do not have a counter to the offer we made back in November. While I believe my clients will prevail at summary judgment based on the evidence produced to date, they may still be willing to put some money on the table to avoid the expense of the motion and depositions.

Thank you,

David A. Grassi
Attorney
The Echols Firm, llc
224 Oakland Ave. (29730)
P.O. Box 12645
Rock Hill, South Carolina 29731
[803.329.8982](tel:803.329.8982)
david.grassi@theecholsfirm.com



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From: Daniel Zemel <dz@zemellawllc.com>

Sent: Tuesday, August 10, 2021 4:40 PM

To: David Grassi <David.Grassi@theecholsfirm.com>

Cc: Chad Diamond <chad.diamond@gmail.com>; Nicholas Linker <NL@zemellawllc.com>; Chad Echols <chad.echols@theecholsfirm.com>; Salley Odom <salley.odom@theecholsfirm.com>

Subject: Re: Hallager v ARS Discovery Responses

David,

The client has been looking for any additional records but has not yet found any. Because subsequent reports and dispute letters are important, I have drafted this subpoena to Experian.

At this time, Plaintiff has no further credit report documents.

On Mon, Aug 2, 2021 at 6:38 PM Daniel Zemel <dz@zemellawllc.com> wrote:

Thanks. Let me take care of this by weeks end.

On Tue, Jul 27, 2021 at 12:49 PM David Grassi <David.Grassi@theecholsfirm.com> wrote:

Daniel,

How much time do you need? I don't mind some extra time, especially under the circumstances, but we also have some deadlines approaching so I do not think I can agree to more than a week.

Thanks,

David A. Grassi

Attorney

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From: Daniel Zemel <dz@zemellawllc.com>

Sent: Tuesday, July 27, 2021 11:56 AM

To: David Grassi <David.Grassi@theecholsfirm.com>

Cc: Chad Diamond <chad.diamond@gmail.com>; Nicholas Linker <NL@zemellawllc.com>; Chad Echols <chad.echols@theecholsfirm.com>; Salley Odom <salley.odom@theecholsfirm.com>

Subject: Re: Hallager v ARS Discovery Responses

David,

Steve has left my firm and a lot has fallen on my shoulders. I will respond to this but I need a bit more time. Is that okay?

On Mon, Jul 19, 2021 at 10:39 AM David Grassi <David.Grassi@theecholsfirm.com> wrote:

Counsel,

Please see the attached correspondence regarding Mr. Hallager's discovery responses.

Thank you,

David A. Grassi

Attorney

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